

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ROBERT AMBROSE, SCOTT
BARNES, RICHARD CHAPMAN,
RYAN CIRIGNANO, CHRIS
FAUSSETT, MILAN GRUJIC, DAVID
KELLER, JOHN KOBEL, DANIEL
LAWSON, STEPHEN LUTSK, LORI
MAGALLANES, NOAM MEIER,
ERIC OSTRANDER, ROBERT
OVERTURF, and MIKE WORONKO,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 4:19-cv-13449

Hon. Stephanie Dawkins Davis

**PLAINTIFFS' MOTION FOR LEAVE TO FILE NOTICE OF
SUPPLEMENTAL AUTHORITY**

1. Counsel for Plaintiffs in the above-referenced matter write to inform the Court of a recent ruling in the Eastern District of Michigan regarding General Motors LLC's ("GM's") motion to dismiss in *Bossart, et. al. v. General Motors LLC*, No. 2:20-cv-11057-BAF-DRG (E.D. Mich.), which involves multistate allegations regarding defective wheels (the "Wheel Defect").

2. Because the *Bossart* opinion implicates some of the same issues at issue in this litigation, Plaintiffs wish to file the attached Notice of Supplemental Authority for the purpose of bringing this case to this Honorable Court's attention (attached hereto at Exhibit 1).

3. Pursuant to Local Rule 7.1, the undersigned counsel certifies that Plaintiffs' counsel communicated with Defendant's counsel on June 21, 2021 regarding the nature of this Motion and Defendant's counsel stated that GM does not oppose the filing of this Motion.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff's Motion for Leave to File the attached Notice of Supplemental Authority.

Dated: June 21, 2021

Respectfully submitted,

/s/ E. Powell Miller
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Sharon S. Almonrode (P33938)
Dennis A. Lienhardt (P81118)
William Kalas (P82113)
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**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO FILE
NOTICE OF SUPPLEMENTAL AUTHORITY**

STATEMENT OF ISSUE PRESENTED

1. Whether Plaintiff should be granted leave to file a Second Notice of Supplemental Authority?

Plaintiff's Answer: Yes.

MOST APPROPRIATE AUTHORITY

E.D. Michigan Local Rule 7.1

Plaintiffs, by and through their undersigned attorneys and in support of their Motion for Leave to File the attached Notice of Supplemental Authority (attached hereto at Exhibit 1), rely on the contents of Plaintiffs' Motion, and the authorities cited therein.

Dated: June 21, 2021

Respectfully submitted,

/s/ E. Powell Miller
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*Attorneys for Plaintiffs and the
Putative Class*

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

/s/ E. Powell Miller

E. Powell Miller (P39487)

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